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TO: Frank Feffer

FROM: Kathy Lacey

RE: Eastlake Project

DATE: 11/7/88

As per your request I have reviewed our solvent usage for the length of time that we have retained documentation and found the only solvent on the list of hazardous materials included in the Eastlake Project Report to be methylene chloride (dichloromethane). Our usage was one gallon per day maximum for the last 12 month period, which was a much higher usage period than in previous years. Prior to 1975, little or no dichloromethane was used in the laboratory; our waste at that time was primarily petroleum ether and acetone.

Prior to May of 1986, we disposed of our solvent via two methods: Laboratory waste was placed in an evaporating pan located outside the building. It was protected from rain by the overhang of the building. Any residue left in the pan after the solvent evaporated was packaged in 55 gallon drums and shipped off-site. On at least one occasion I was aware that Stu Evans (employed by Chemonics) showed the evaporating pan to an Arizona Department of Health Service employee (Norm Gumenik, I believe) and was told we could continue this operation until told otherwise. Mr. Evans also alleged to me that he discussed the evaporating pan with someone from EPA and received the same response. Because I was knowledgeable that the ADHS lab was evaporating solvent in a hood in their lab, the assumption was made that our laboratory was operating within the required parameters. During an inspection conducted by Norm Gumenik on 10/10/80, the pan was inspected and no corrective actions were required by ADHS. A copy of this report is in our files.

On 2/19/86 a facility inspection was conducted by Gail Clement of ADHS. Many of the violations listed were only violations if the laboratory was a large quantity generator. I responded to all allegations on June 5, 1986 and no further action was taken. This response included copies of all manifests for disposal of the waste dating back to 3/7/83 as well as annual reports, facility inspections, laboratory analysis and facility maps. It should be noted that the inspection was performed in my absence and Ms. Clement indicated to me on the phone that it was conducted as if the lab was a large quantity generator because she was provided some misleading information. My presence at the inspection would probably have clarified the laboratory's status and resulted in a different outcome in the report.

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Currently the laboratory wastes are disposed by Rinchem (2/87 thru present), prior to that CTI was used (10/86 thru 12/86) as well as Chemical Waste Management (9/82 thru 6/86). Copies of the manifests for all shipments made from these premises, using these three companies, are available. All drums disposed of through CTI and Rinchem were incinerated.

Further, to my knowledge there has never been a release of solvents on the premises other than minor spills within the laboratory building (from a couple of milliliters to a couple of liters maximum). When the lab began using solvents in 1972, usage was probably not more than 1-2 gallons per day of all solvents combined. No chlorinated solvents have ever been disposed of down the sink.

Copies of the above referenced documents are available. Please contact me if additional information is needed.

KL/vc